

IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT, IN AND
FOR PALM BEACH COUNTY, FLORIDA.

CASE NO.:

C.M.A.,
Plaintiff,

SD 2008 CA 005240 XXXX MB AF

vs.

JEFFREY EPSTEIN, and SARAH KELLEN,
Defendants.

COMPLAINT

Plaintiff, C.M.A. sues the Defendants, JEFFREY EPSTEIN and SARAH KELLEN, and alleges:

1. This is an action for damages in excess of Fifteen Thousand Dollars (\$15,000.00), exclusive of costs and interest.
2. At all times material hereto, the Plaintiff, C.M.A. was and is a resident of Palm Beach County, Florida. Plaintiff is a female who is presently twenty-one years old.
3. The Plaintiff is unsure of the residency of defendant JEFFREY ESPSTEIN, because he has residences in New York, Florida, New Mexico, and also outside of the continental United States.
4. The defendant, SARAH KELLEN, was a resident of Florida.

COUNT I

5. Plaintiff incorporates into this count the allegations of paragraphs 1 through 3.
6. On numerous occasions while the Plaintiff was a minor, beginning when she was fourteen, the defendant, JEFFREY EPSTEIN intentionally induced and/or seduced the Plaintiff into performing various acts of lewd and lascivious conduct and/or sexual performances in his presence. These acts all took place at the mansion owned by the defendant JEFFREY EPSTEIN which was located in Palm Beach, Florida.
7. On numerous occasions while the Plaintiff was a minor, the defendant, JEFFREY EPSTEIN performed various acts of lewd and lascivious conduct in the presence of the Plaintiff. These acts all took place at the mansion owned by the defendant JEFFREY EPSTEIN which was located in Palm Beach, Florida.
8. On numerous occasions while the Plaintiff was a minor, the defendant, JEFFREY EPSTEIN touched the Plaintiff's breasts and genitalia. These acts all took place at the mansion owned by the defendant JEFFREY EPSTEIN which was located in Palm Beach, Florida.
9. As a result, the Plaintiff suffered mental anguish, mental pain and suffering, psychic trauma, and a loss of the capacity for the enjoyment of life.

WHEREFORE, THE PLAINTIFF DEMANDS JUDGMENT FOR DAMAGES AGAINST JEFFREY EPSTEIN, IN AN AMOUNT IN EXCESS OF FIFTEEN THOUSAND DOLLARS, EXCLUSIVE OF COSTS AND INTEREST, AND FURTHER DEMANDS TRIAL BY JURY.

COUNT II

10. Plaintiff incorporates into this count the allegations of paragraphs 1 through 4, and paragraphs 6 through 9.

11. For each and every occurrence of sexual abuse of the Plaintiff while she was a minor for which JEFFREY EPSTEIN was responsible, he was aided, assisted, and/or abetted by SARAH KELLEN, who lived at the Palm Beach mansion of JEFFREY EPSTEIN. Said acts included, but were not limited to, the following:
- a. She often called the Plaintiff, when the Plaintiff was a minor, to arrange for the Plaintiff to come to the Palm Beach mansion of JEFFREY EPSTEIN, for the ostensible purpose of providing "massages" to JEFFREY EPSTEIN, when she knew or should have known that Plaintiff had no credentials to provide massage therapy.
 - b. She observed the Plaintiff being brought to the Palm Beach mansion of JEFFREY EPSTEIN, when the Plaintiff was a minor, and sometimes escorted the Plaintiff to a room in that mansion where JEFFREY EPSTEIN was waiting, for the ostensible purpose of providing "massages" to JEFFREY EPSTEIN, when she knew or should have known that Plaintiff had no credentials to provide massage therapy.
 - c. She sometimes paid the Plaintiff for the "sessions" with JEFFREY EPSTEIN.
 - d. She made telephone calls to the Plaintiff, when the Plaintiff was a minor, to arrange for gifts to be sent to the Plaintiff.
 - e. She took photographs of the Plaintiff, when the Plaintiff was a minor, which depicted the Plaintiff in the nude. She told the Plaintiff that the pictures were at the request of JEFFREY EPSTEIN, and paid the Plaintiff for posing for the photographs.
12. As a result, the Plaintiff suffered mental anguish, mental pain and suffering, psychic trauma, and a loss of the capacity for the enjoyment of life.

WHEREFORE, THE PLAINTIFF DEMANDS JUDGMENT FOR DAMAGES AGAINST SARAH KELLEN, IN AN AMOUNT IN EXCESS OF FIFTEEN THOUSAND DOLLARS, EXCLUSIVE OF COSTS AND INTEREST AND FURTHER DEMANDS TRIAL BY JURY.

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